

FILED

AUG 26 2015

DAVID CREWS, CLERK
BY *S. J. Dwyer* Deputy

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15CR 098
18 U.S.C. § 2339B(a)(1)

MUHAMMAD ODA DAKHLALLA and
JAELYN DELSHAUN YOUNG

INDICTMENT

The Grand Jury charges that:

Count One

(Conspiring to Provide Material Support to
a Designated Foreign Terrorist Organization)

From on or about May 1, 2015, and continuing through August 8, 2015, within the
Northern District of Mississippi and elsewhere, the defendants,

MUHAMMAD ODA DAKHLALLA and
JAELYN DELSHAUN YOUNG,

together, and with others known and unknown to the grand jury, knowingly did combine,
conspire, confederate, and agree together and with each other to provide “material support or
resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including
personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant
(“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign
terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing
that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States
Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in
section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined

in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1).

Count Two

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about August 8, 2015, within the Northern District of Mississippi and elsewhere,
the defendant,

JAELYN DELSHAUN YOUNG,

a national of the United States, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including herself and defendant MUHAMMAD ODA DAKHLALLA), to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1) and Section 2.

Count Three

(Attempting to Provide Material Support to
a Designated Foreign Terrorist Organization)

On or about August 8, 2015, within the Northern District of Mississippi and elsewhere,
the defendant,

MUHAMMAD ODA DAKHLALLA,

a national of the United States, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including himself and defendant JAELYN DELSHAUN YOUNG), to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), all in violation of Title 18, United States Code, Section 2339B(a)(1) and Section 2.

A TRUE BILL

/s/ Signature Redacted
FOREPERSON


UNITED STATES ATTORNEY